

IN THE UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF DELAWARE

MICHAEL LEE ROSE

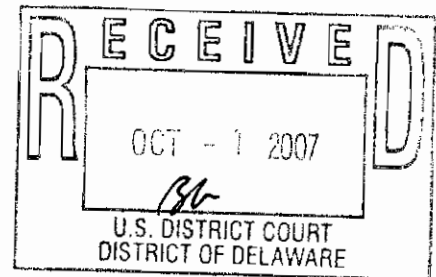
PLAINTIFF

V.

FIRST CORRECTIONAL MEDICAL  
CORRECTIONAL MEDICAL SERVICES  
DR. NIAZ

DEFENDANT

*CA 06-370-JJF*  
Case No. \_\_\_\_\_  
Case I.D. No. \_\_\_\_\_  
#370-(JJF)



**MOTION FOR ADMISSION**

Plaintiff Michael Lee Rose (here after referred to a Rose) request Defendant Dr. Niaz to make the following admissions within thirty (30) days after service of this request. For the purpose of this action only and subject to all pertinent objections as to admissibility which may be interposed at trial.

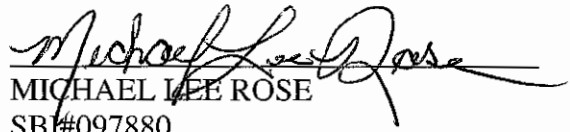
Each of the following statements are true:

1. Admit on a number of occasions Mr. Rose discussed his medical problems with Dr. Niaz.
2. Admit while Mr. Rose was at St. Francis Hospital in Wilmington, Delaware you Dr. Niaz stated that you no loner worked for the Delaware Correctional Center.
3. Admit that you Dr. Niaz stated that you worked for St. Francis Hospital.
4. Admit that you Dr. Niaz were my physician at that time.

5. Admit that you Dr. Niaz stated that something was found on my lung and Mr. Rose asked what was going to be done about that. You Dr. Niaz stated nothing I was too far gone.
6. Admit Dr. Niaz that you stated I had six (6) months to one (1) year to live.
7. Admit Dr. Niaz after I was released back to the care of D.C.C. you were there and I asked for your help again and again you did nothing.
8. Admit Dr. Niaz that not long after this incident with Mr. Rose you left D.C.C.
9. Admit Dr. Niaz that you refused to help Mr. Rose's serious medical condition and you wrote him off and moved on.
10. Admit you Dr. Niaz know how serious Hepatitis C is, how painful and mentally debilitating this disease can be especially when it is left untreated.
11. Admit Dr. Niaz that you are working under the color of the state.

VERY RESPECTFULLY SUBMITTED

DATED: September 27, 2007

  
MICHAEL LEE ROSE  
SBI#097880  
DELAWARE CORRECTIONAL CENTER  
1181 PADDOCK ROAD  
SMYRNA, DE 19977